

Laursen discloses, in Fig. 2b, that each mobile device in the data network has a single user account identified in a link server 114 by a single corresponding device ID 140 and a single subscriber number (sub #) 142. The single corresponding device ID 140 of Laursen, assigned to each mobile device, can be a phone number or combination of an IP address and a port number. The single subscriber number 142 of Laursen is a unique device ID of the mobile device (col. 7, lines 46-65). A corresponding user account 144 in the database 130 of Laursen correlates the subscriber number 142 with user information 146, a username 148 and a password 150 (col. 8, lines 4-10, and Fig. 2). Therefore, a single mobile device in Laursen has a single subscriber number that corresponds to a single user account (col. 7, lines 63-65).

By associating a single subscriber number with the single user account, the user can predetermine or pre-enter transactions desired into the user account so that the user may select the desired transactions without the need to key in pertinent information on the mobile device (col. 7, lines 1-31). Because Laursen discloses storing only a single device ID for each user, Laursen does not disclose a storage media that stores a plurality of terminal IDs for each user, as recited in independent claims 3 and 4.

The Office Action acknowledges that Laursen does not disclose a storage media that stores a plurality of terminal IDS for each user, as recited in independent claims 3 and 4. However, the Office Action asserts that Carlsson remedies the deficiencies of Laursen. Specifically, the Office Action asserts that Carlsson teaches allowing several terminals to assess a single account so that a cellular user may be able to pick up any available cellular terminal and receive calls based upon the same subscription (col. 2, lines 5-8, and col. 6, lines 61-67). Therefore, the Office Action asserts that it would have been obvious for a person of ordinary skill in the art to modify Laursen to include a plurality of terminal IDs for each user, associated with a personal ID/subscriber ID. These assertions are respectfully traversed.

Laursen cannot be permissibly combined with Carlsson to teach a storage media that stores a plurality of terminal IDS for each user as suggested by the Office Action.

First, the proposed modification of Laursen with the teachings of Carlsson would render Laursen unsatisfactory for its intended purpose. "If the proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification." *In re Gordon*, 733 F. 2d 900, 221 USPQ 1125 (Fed. Cir. 1984); MPEP §2143.01.

As discussed above, Laursen requires a direct association between the user account and device through the subscription number, i.e., the telephone number, in the link server. However, Carlsson discloses a system that assigns a telephone number (arguably corresponding to a subscription number) to a particular user rather than a particular terminal (col. 2, lines 36-59). Carlsson, as shown in Fig. 2, teaches separately storing the subscription records, the user records and the terminal information (col. 5, lines 32-37). Because each of the three records is stored separately in the system, there is a clear distinction between each user, each subscriber terminal, and each subscription. Therefore, the number of registers or storage means for each of the above three records do not have to be the same (col. 5, lines 32-37).

By not storing these records together, Carlsson does not provide a distinct association between the subscription records (arguably a subscription number) and a particular terminal, and allows multiple subscriptions to be associated with a single user (col. 3, line 1-6).

Because the subscription number and personal information are directly correlated to a mobile device in Laursen, modifying the storage media of Laursen to store multiple terminals for a user as taught by Carlsson would render Laursen unsatisfactory for its intended purpose. In fact, Carlsson teaches away from such a combination or modification.

Second, the proposed modification would change the principle of operation of Laursen and Carlsson. "If the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims *prima facie* obvious." See *In re Ratti*, 270 F.2d 810, 123 USPQ 349 (CCPA 1959) MPEP §2143.01.

As discussed above, Laursen discloses a data network that has a single user account identified by a corresponding device ID and subscription number, and thus Laursen teaches a principle operation that directly associates a single user account to a single mobile device. However, the system of Carlsson, as discussed above, allows multiple subscriptions to be associated with a single user by teaching no distinct association between the user, the terminal and the subscription. Because the subscription number and personal information are directly correlated to a phone in Laursen, modifying the storage media of Laursen to store multiple terminals for a user as taught by Carlsson, is directly contrary to the specific teachings of Laursen and would change the principle of operation of Laursen. For at least these reasons, the teachings of Carlsson and Laursen are not sufficient to render the claims *prima facie* obvious.

Therefore, a person of ordinary skill in the art would not have been motivated to combine the teachings of Laursen with teachings of Carlsson regarding a storage media as asserted by the Office Action. Because no motivation exists in either Laursen or Carlsson to be combined or modified as alleged by the Office Action, the asserted combination is improper and appears to be based on impermissible hindsight.

The storage media recited in independent claims 3 and 4 stores, for each user, a plurality of communication terminals, a personal ID and personal information of the user. The at least one communication terminal ID and personal information are correlated with the personal ID in the storage media so that regardless of the number of the communication

terminals used by the user, a single personal ID is set for a user (col. 8, lines 5-23 and Figs. 2 and 3). Further, the storage media recited in claims 3 and 4 stores the communication terminal ID and personal information correlated with the personal ID, so that the personal information is centrally managed according to the personal ID (col. 8, lines 19-23). Laursen and Carlsson do not teach or suggest such features or provide such advantages.

Thus, for at least these reasons, independent claims 3 and 4 are patentable over Laursen and Carlsson. Further, claims 5-8, which variously depend from claims 3 and 4, are also patentable over Laursen and Carlsson for at least the reasons discussed above with respect to claims 3 and 4, as well as for the additional features they recite. Withdrawal of the rejection is thus respectfully requested.

## **II. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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